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15   **UNITED STATES DISTRICT COURT**
16   **NORTHERN DISTRICT OF CALIFORNIA**
            SAN FRANCISCO DIVISION
17

18 ATHALONZ, LLC   Case No. 3:23-mc-80324-LJC

19   Plaintiff,

20   **DECLARATION OF ROBERT E. BUGG
                                           IN SUPPORT OF NON-PARTY
21   v.   WARDELL STEPHEN CURRY II'S
                                           OPPOSITION TO PLAINTIFF'S
22   MOTION FOR DE NOVO
                                           DETERMINATION**
23 UNDER ARMOUR, INC.

24   Defendant.

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1 I Robert E. Bugg, do hereby declare as follows:

2   1.   I am an attorney licensed to practice law in New York, a partner at Venable LLP,

3 and counsel of record for non-party Wardell Stephen Curry II ("Curry"). I have personal

4 knowledge of the matters contained herein and if called, could and would testify competently

5 thereto.

6   2.   I am over 18 years of age and suffer no legal disabilities.

7   3.   This declaration is submitted in support of Non-Party Curry's Opposition to

8 Plaintiff's Motion for De Novo Determination.

9   4.   Attached hereto as Exhibit 1 is a true and accurate copy of an Order Denying

10 Plaintiff's Motion to Compel in *Collision Commc'ns, Inc. v. Nokia Sols. And Networks*, No.

11 2:21-cv-00308-JRG, Dkt. 96 (E.D. Tex. Aug. 10, 2022).

12   5.   Attached hereto as Exhibit 2 is a true and accurate copy of an Order Denying

13 Plaintiff's Motion to Compel in *SEVEN Networks, LLC v. Google LLC,* No. 2:17-cv-00442-JRG,

14 Dkt. 210 (E.D. Tex. June 29, 2018).

15   6.   Attached hereto as Exhibit 3 is a true and accurate copy of the Complaint filed in

16 *Collision Commc'ns, Inc. v. Nokia Sols. And Networks*, No. 2:21-cv-00308-JRG, Dkt. 1 (E.D.

17 Tex. Aug. 10, 2021).

18   7.   Attached hereto as Exhibit 4 is a true and accurate copy of U.S. Patent No.

19 7,724,851.

20   8.   Attached hereto as Exhibit 5 is a true and accurate copy of U.S. Patent No.

21 9,888,479.

22   9.   Attached hereto as Exhibit 6 is a true and accurate copy of U.S. Patent No.

23 10,477,561.

24   10.   Attached hereto as Exhibit 7 is a true and accurate copy of U.S. Patent No.

25 9,654,562.

26   11.   Attached hereto as Exhibit 8 is a true and accurate copy of U.S. Patent No.

27 9,203,930.

28   / /

Case No. 3:23-mc-80324-LJC   DECLARATION OF ROBERT E. BUGG

1   I declare under penalty of perjury under the laws of the United States of America that the

2 foregoing is true and correct.

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4   Executed on March 12, 2024.

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7   _____

8   Robert E. Bugg

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